

EXHIBIT A

IN THE COURT OF COMMON PLEAS
OF DAUPHIN COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

Beth Dooz
352 Tomlinson Terrace
Philadelphia, PA 19116

Plaintiff

v
National Recovery Agency, Inc.
2491 Paxton Street
Harrisburg, PA 17111
and
X,Y,Z Corporations

Defendant

2014 CV 967

Jury Trial Demanded

2015 FEB 12 AM 9:26
DAUPHIN COUNTY
PENNSYLVANIA

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice to you for any money claimed in the Complaint or for any other claim or relief requested by Plaintiff(s). You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

MID-PENN LEGAL SERVICES
29 NORTH QUEEN STREET, YORK, PA 17403
717-848-3605 Fax: 717-854-5431

PA BAR ASSOCIATION
P.O. BOX 186, HARRISBURG, PENNSYLVANIA 17018
717-238-6715

IN THE COURT OF COMMON PLEAS
OF DAUPHIN COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

Beth Dooz
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Plaintiff

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National Recovery Agency, Inc.
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DAUPHIN COUNTY
PENNA

COMPLAINT

1. This is an action brought by an individual consumer for Defendant's violations of the Fair Debt Collection Practices Act 15 U.S.C. 1692, et seq. (hereinafter "FDCPA"), as well as 15 USC 1681 et. seq. of the Fair Credit Reporting Act (FCRA).
2. Plaintiff is Beth Dooz, an adult individual with a current address of 352 Tomlinson Terrace, Philadelphia, PA 19116.
3. Defendant is National Recovery Agency, Inc. with a principle place of business located at 2491 Paxton Street, Harrisburg, PA 17111.
4. Defendants may also include, XYZ Corporations, business entities who names and identities are not know to Plaintiff at this time, but which may become known in discovery. It is believed and averred that such entities may have played a substantial role in the acts or omissions referred to in this Complaint.

**COUNT ONE: Violation of Fair Debt Collection Practices Act
15 USC 1692 et. seq.**

5. The previous paragraphs of this complaint are incorporated by reference.
6. At all times mentioned in this Complaint, Plaintiff was a consumer debtor as defined by the Fair Debt Collections Practices Act (FDCPA), 15 USC 1692 et. Seq.
7. At all times mentioned in this Complaint Defendant was is a debt collector as defined by the FDCPA, 15 USC 1692 et. seq.
8. At all times mentioned in this Complaint. Defendant was attempting to collect on an alleged consumer debt against Plaintiff for an ambulance bill from a medical care provider whose name is redacted in this Complaint for Plaintiff's privacy considerations, referred to in this Complaint as "PA ***** Group, P.C."
9. The alleged debt from "PA ***** Group, P.C." was for Plaintiff's personal medical care, and was therefore a consumer debt as defined by 15 USC 1692 et. seq. of the FDCPA.
10. The alleged debt was also a consumer debt as defined by 15 USC 1681 et. seq. of the FCRA.
11. Prior to the commencement of this action, Defendant(s) contacted Plaintiff by letter about said debt PA ***** Group, P.C. (full name redacted for Plaintiff's privacy) for an

alleged medical debt. The letters indicated there was a principle amount due to PA ***** P.C. of \$705.80, plus \$105.87 in "cost," for a total alleged balance of \$811.67. See attached exhibits.

12. Plaintiff never agreed to pay PA ***** Group, P.C. any costs associated with the collection of the account.
13. Any contract which Plaintiff might have had with PA ***** Group, P.C. would have been under the theory of implied contract or quantum meruit only, and not for any costs associated with the collection of the account.
14. Plaintiff was never legally responsible for \$105.87 in "costs," and did not owe the "costs."
15. Defendant(s) knew or should have known that Plaintiff did not legally owe \$105.87 in "costs."
16. By adding on unauthorized \$105.87 in "costs," Defendants committed a violation of 15 USC 1692(f)(1) which prohibits the collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law.
17. By claiming for \$105.87 in "costs," Defendants committed a violation of 15 USC 1692e(2)(A) which prohibits misrepresentation of the character and amount of the debt.

**COUNT TWO: Violation of the Fair Credit Reporting Act (FCRA),
15 USC 1681 et. seq.**

18. The previous paragraphs of this complaint are incorporated by reference and made a part hereof.
19. At all times mentioned herein Plaintiff was a consumer as defined by the FCRA.
20. At all times mentioned herein Defendant was a furnisher of information as defined by the FCRA.
21. Prior to the commencement of this action, plaintiff disputed the amount of the alleged debt which Defendant had caused to be placed on Plaintiff's consumer report. Plaintiff disputed the amount of the \$105.87 in costs. Such disputes were in writing. See attached exhibits.
22. Plaintiff's written disputes were received by Defendant, but were disregarded, and Defendant continued to report the alleged balance containing \$105.87 in costs.
23. Because Defendant refused to make any changes to Plaintiff's consumer report, Plaintiff was left with no other recourse than to dispute the account with the following consumer reporting agency(ies) (CRAs).
 - a. Transunion, LLC
 - b. Equifax Information Services, LLC
 - c. Experian Information Solutions, Inc.

24. Defendant then verified to all three of the above mentioned CRA(s) that that Plaintiff owed \$811.67, more or less, which included "costs" of \$105.87 which Plaintiff did not owe.
25. When Defendant verified the derogatory information to the CRA(s), Defendant(s) investigation process was not reasonable because the documents provided by Plaintiff clearly showed the Plaintiff did not owe the "costs" of \$105.87.
26. Upon information and belief, it is averred that Defendant(s) have a standard practice policy which contradicts its duties pursuant to 15 USC 1661 s-2.
27. 15 USC 1661 s-2 requires a furnisher to conduct a reasonable investigation of an account which appears on a consumer's credit report, upon written request of the consumer to do so.
28. The United States Court of Appeals for the Fourth Circuit held that the FCRA requires furnisher to conduct detailed examinations of the documents underlying customer transactions before responding to inquiries about a customer's debt, instead of relying on computer databases that provide convenient but potentially incomplete or inaccurate customer account information. See *Johnson v. MBNA America Bank*, No. 03-1235 (February 11,2004).
29. Defendant(s) investigation process did not live up to the standards of *Johnson v. MBNA America Bank*, No. 03-1235 (February 11,2004).

30. The Federal Trade Commission has issued a consent order stating that a debt collector must refer to original account records when necessary to investigate a dispute. U.S. v. Performance Capital Mgmt. (Bankr. C.D. Cal. Aug. 24, 2000) (consent decree). A debt collector shouldn't be able to rely on the balance due transmitted by the original collector during the sale of the account. If the debt collector cannot or is unwilling to obtain the original account records, the information should be deleted.
31. The Defendant(s) investigation process did not live up to the standards of the Federal Trade Commission's consent order.
32. Defendant(s) violated the duty under 15 USC 1681 s-2 by verifying the above referenced account without conducting a reasonable investigation.
33. Defendant(s) violated the duty under 15 USC 1681 s-2 by verifying the above referenced account when the facts and the evidence clearly showed that Plaintiff did not owe \$105.87 in "costs."

LIABILITY

34. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.
35. Defendant is liable for the acts committed by its agents under the doctrine of respondeat superior because Defendant's agents were acting within the scope of their employment with Defendant.
36. In the alternative, Defendant is liable for the conduct of its agents / employees under the theory of joint and several liability because Defendant and its agents / employees were engaged in a joint venture and were acting jointly and in concert.
37. It is believed and averred that the named Defendant(s) were acting jointly and in concert.
38. In the alternative, it is believed and averred that the named Defendant(s) were acting in an agency relationship.

DAMAGES

39. All previous paragraphs of this complaint are incorporated by reference and made a part of this Complaint.
40. Plaintiff believed and avers that Plaintiff is entitled to at least \$1.00 actual damages, including but not limited to phone, fax, stationary, postage, travel, etc.
41. Plaintiff believed and avers that Plaintiff is entitled to \$1,000.00 statutory damages under the FDCPA 15 USC 1692k, or other amount determined by this Honorable Court.
42. Plaintiff believed and avers that Plaintiff is entitled to \$3,000.00 statutory damages under the FCRA 15 USC 1681 et. seq. which would be \$1,000 per time that Defendant verified the false information to a CRA, once for Transunion, LLC, Once for Equifax Information Services, LLC and once for Experian Information Solutions, Inc., or other amount determined by this Honorable Court. Defendant verified the false information
43. Plaintiff was angered, distressed and disgusted about the aforementioned misconduct of Defendant. For purposes of a default judgment, Plaintiff believes and avers that such distress should have a dollar value of at least \$5,000.00.
44. Plaintiff believes and avers that Defendant's violation of the FCRA were willful and not accidental.

45. Because Defendant's misconduct was willful, Plaintiff believes and avers that punitive damages are warranted.

46. For purposes of a default judgment, Plaintiff believes and avers that such punitive damages should be no less than \$9 times the amount of the statutory damages being sought in this case which would be \$9,000.00, or such other amount as the Court determines to be appropriate.

ATTORNEY FEES

47. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.

48. Plaintiff believes and avers that Plaintiff is entitled to reasonable attorney fees for prosecuting this action.

49. Plaintiff believes and avers that the reasonable rate for attorney fees for prosecuting this action is \$350.00 per hour, or other rate approved by this Honorable Court.

50. Plaintiff believes and avers that such attorney fees should amount to no less than \$2,625.00, enumerated below.

a. Consultation with client and review of file; drafting, editing and review of dispute letters to Defendant	2.5
b. Drafting, editing and review of dispute letters to consumer reporting agency(ies)	1
c. Drafting, editing, review, filing and service of complaint and related documents	2
d. Follow up with Defendant(s) and client	2

$7.5 \times \$350 = \$2,625.00$

51. Plaintiff's attorney fees continue to accrue as the case move forward.

OTHER RELIEF

52. All previous paragraphs of this complaint are incorporated by reference and made a part of this portion of the complaint.

53. Plaintiff seeks injunctive relief barring further unlawful collection activity.

54. Plaintiff seeks such other relief as this Honorable Court may deem just and proper.

55. Plaintiff seeks the filing fee for prosecuting this action.

56. Plaintiff seeks costs for prosecuting this action.

57. Plaintiff requests / demands a jury trial in this matter

Wherefore, plaintiff demands judgment against defendant in the amount of \$29,626.00 enumerated below.

\$1.00 more or less actual damages.

\$1,000.00 statutory damages for Count One for violation of the FDCPA

\$3,000.00 statutory damages, which is \$1,000 for each FCRA violation for each instance of verification to a CRA

\$2,625.00 attorney fees

\$5,000.00 emotional distress

\$18,000.00 punitive damages

\$29,626

Vicki Piontek
Vicki Piontek, Esquire
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
877-737-8617
Fax: 866-408-6735
palaw@justice.com

2/9/2015
Date

IN THE COURT OF COMMON PLEAS
OF DAUPHIN COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

Beth Dooz
352 Tomlinson Terrace
Philadelphia, PA 19116

Plaintiff

2014 CV 967

v
National Recovery Agency, Inc.
2491 Paxton Street
Harrisburg, PA 17111
and
X,Y,Z Corporations

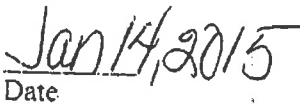
Jury Trial Demanded

Defendant

VERIFICATION

I, Beth Dooz, affirm that the statements contained in the attached amended complaint are true and correct to the best of my knowledge, understanding and belief.


Beth Dooz


Date

EXHIBITS

NATIONAL RECOVERY AGENCY2491 Paxton Street, Harrisburg PA 17111
Toll Free: (800) 360-4319PIN [REDACTED]
NRA [REDACTED]
TOTAL DUE: \$811.67Beth Dooz
352 Tomlinson Ter
Philadelphia, PA 19116-3216

Dear Beth Dooz,

Your account has been forwarded to this office for collections.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.


Below is a listing of accounts included in the total amount due listed above:


ORIGINAL CREDITOR	ACCOUNT #	DATE	AMOUNT	INTEREST	COSTS	AMT OWED
[REDACTED] GROUP PC	[REDACTED]	09/12/12	705.80	.00	105.87	811.67


Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Unless you dispute this debt, your payment should be made directly to this office. Please choose one of the following methods of payment. Please note that a service charge of twenty dollars will be added to all checks returned to us by your bank as permitted by law.

NOTICE: SEE REVERSE SIDE FOR IMPORTANT NOTICES AND CONSUMER RIGHTS**PAYMENT OPTIONS**

 **Telephone Hours:**
Monday - Thursday 8:00 A.M. to 8:30 P.M.
Friday 8:00 A.M. to 5:00 P.M.
Saturday 8:00 A.M. to 12:30 P.M.
Eastern Standard Time
(800) 360-4319

 **Send Mail To:**
NATIONAL RECOVERY AGENCY
PO Box 67015
HARRISBURG, PA 17106-7015


 **Via Internet:**
Pay online by credit card
or check at
www.nationalrecovery.com

Calls to or from NATIONAL RECOVERY AGENCY may be recorded or monitored.

To ensure proper credit to your account please detach bottom portion and return it with payment in the enclosed envelope.PO Box 67015
Harrisburg, PA 17106-7015Toll Free: (800) 360-4319
Statement Date: August 2, 2013Beth Dooz
352 Tomlinson Ter
Philadelphia, PA 19116-3216

IF PAYING BY CREDIT CARD, FILL OUT BELOW.			
VISA	<input type="checkbox"/> VISA	<input type="checkbox"/> MasterCard	<input type="checkbox"/> Discover
CARD NUMBER		SECURITY CODE	
SIGNATURE		EXP. DATE	
TOTAL DUE \$811.67	\$ PAYMENT AMOUNT		NRA ID# ZBP757
For Online Payments visit www.nationalrecovery.com			

MAKE PAYMENT AND REMIT TO:


NATIONAL RECOVERY AGENCY
PO Box 67015
Harrisburg, PA 17106-7015

Self-Addressed stamped envelope is required for return receipts.

Beth Dooz
352 Tomlinson Terrace
Philadelphia PA 19116

National Recovery Agency
2491 Paxton Street
Harrisburg, PA 17111

RE: Alleged Creditor: PA [REDACTED] Group, P.C.
Account Number: [REDACTED]
Alleged Balance \$811.67

To Whom it May Concern:

I wish to dispute the above referenced account. I request validation of the alleged debt.
Please explain what the \$105.87 in "costs" refers to. I never agreed to such costs. I never
signed any agreement to pay "costs".

Please produce documentation for any legal basis which you claim to be entitled to
charge me "costs".

I request proof of the fair market value of the services rendered. How did the original
alleged creditor compute the amount that they claim was owed?

Sincerely,

Beth Dooz

Date

Beth Dooz
352 Tomlinson Terrace
Philadelphia PA 19116

National Recovery Agency
2491 Paxton Street
Harrisburg, PA 17111

RE: Alleged Creditor: PA [REDACTED] P.C.
Account Number: [REDACTED]
Alleged Balance \$811.67

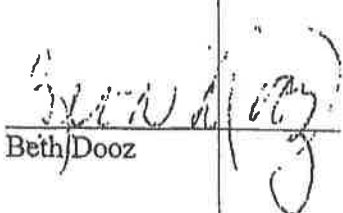
To Whom it May Concern:

I wish to dispute the above referenced account. I request validation of the alleged debt.
Please explain what the \$105.87 in "costs" refers to. I never agreed to such costs. I never
signed any agreement to pay "costs".

Please produce documentation for any legal basis which you claim to be entitled to
charge me "costs".

I request proof of the fair market value of the services rendered. How did the original
alleged creditor compute the amount that they claim was owed?

Sincerely,


Beth Dooz

10-12-13
Date

7012 2920 0001 4255 3870

U.S. Postal ServiceTM			
CERTIFIED MAILTM RECEIPT			
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>			
For delivery information visit our website at www.usps.com			
Postage		\$	\$0.46
Certified Fee		\$	\$3.10
Return Receipt Fee (Endorsement Required)		\$	\$2.55
Restricted Delivery Fee (Endorsement Required)		\$	\$0.00
Total Postage & Fees		\$	\$6.11
PS Form 3800, August 2005		See Reverse for Instructions	

Sent To	<i>National Recovery Agency</i>
Street, Apt. No., or PO Box No.	<i>2451 Parker Street</i>
City, State, ZIP+4	<i>Harrisburg, PA 17111</i>

Postmark Here	0155
10/23/2013	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return this card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery 10/26/12</p> <p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>National Recovery Agency 2491 Paxton Street Harrisburg, PA 17111</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7012 2920 0001 4255 3670</p>		<p>Domestic Return Receipt</p> <p>102805-02-M-1540</p>	
<p>PS Form 3811, February 2004</p>			

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Beth Dooz
352 Tomlinson Terrace
Philadelphia, PA 19116



Beth Dooz
352 Tomlinson Terrace
Philadelphia, PA 19116

National Recovery Agency
2491 Paxton Street
Harrisburg, PA 17111

By Certified U.S. Mail

RE: Alleged Creditor: PA [REDACTED] Group, P.C.
Account Number [REDACTED]
Alleged Principal Balance \$705.80
Alleged Collection Costs \$105.87
Alleged Total Balance \$811.67

To Whom it May Concern:

I wish to dispute the above referenced account.

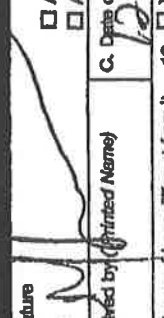
You must eliminate the \$105.87 in "costs." I never agreed to pay any collection costs to PA Heart and Vascular Group, P.C. I never signed anything agreeing to pay collection costs for this account. I never expressly agreed to pay collection costs for this account. You are not permitted to charge me collection costs which I never agreed to.

I also request proof of the fair market value of the services rendered. How did the original alleged creditor computed the amount that they claim was owed?

Sincerely,


Beth Dooz

11-28-13
Date

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: <i>National Recovery Agency</i> <i>2441 Paxton Street</i> <i>Hamburg, PA 17111</i> </p>		<p>B. Received by (Printed Name) <i>X.D.N.</i> C. Date of Delivery <i>12-4</i></p>	
<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below. </p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> G.O.D. </p>	
<p>2. Article Number (Transfer from service label) PS Form 3811, February 2004 </p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7012 2920 0001 4255 4105</p>		<p>102595-02-11-15/40</p>	

BETH DOOZ
352 TOMLINSON TER
PHILADELPHIA, PA 19116-3216

ITEM	DESCRIPTION	RESULTS
NTL RECOVERY AGENCY	[REDACTED] ***	VERIFIED, NO CHANGE

Page: 1 of 1

File Number:
Date Issued:339784192
01/31/2014

TransUnion.

-Begin Credit Report-

ACCOUNT INFORMATION

Account Number: [REDACTED] Account Type: [REDACTED] Account Status: [REDACTED] Account Opened: [REDACTED] Account Closed: [REDACTED] Account Delinquent: [REDACTED] Account In Collection: [REDACTED] Account Reviewed: [REDACTED] Account Verified: [REDACTED] Account Valid: [REDACTED] Account Active: [REDACTED] Account Suspended: [REDACTED] Account Frozen: [REDACTED] Account Deleted: [REDACTED] Account Archived: [REDACTED] Account Purged: [REDACTED] Account Retired: [REDACTED] Account Terminated: [REDACTED] Account Closed: [REDACTED] Account Deleted: [REDACTED] Account Archived: [REDACTED] Account Purged: [REDACTED] Account Retired: [REDACTED] Account Terminated: [REDACTED]

RATING

Rating: [REDACTED] Rating Description: [REDACTED] Rating Date: [REDACTED] Rating Valid: [REDACTED] Rating Active: [REDACTED] Rating Suspended: [REDACTED] Rating Frozen: [REDACTED] Rating Deleted: [REDACTED] Rating Archived: [REDACTED] Rating Purged: [REDACTED] Rating Retired: [REDACTED] Rating Terminated: [REDACTED]

ACCOUNT AGENCY

Agency Name: [REDACTED] Agency Address: [REDACTED] Agency City: [REDACTED] Agency State: [REDACTED] Agency Zip: [REDACTED] Agency Phone: [REDACTED] Agency Fax: [REDACTED] Agency Email: [REDACTED] Agency Website: [REDACTED] Agency Status: [REDACTED] Agency Active: [REDACTED] Agency Suspended: [REDACTED] Agency Frozen: [REDACTED] Agency Deleted: [REDACTED] Agency Archived: [REDACTED] Agency Purged: [REDACTED] Agency Retired: [REDACTED] Agency Terminated: [REDACTED]

NTL RECOVERY AGENCY *** (2491 PAXTON ST, HARRISBURG, PA 17111, (717) 540-5605)

Placed for collection: 08/01/2013

Responsibility: Individual Account

Account Type: Open Account

Loan Type: COLLECTION AGENCY/ATTORNEY

Balance: \$812

Date Updated: 01/05/2014

Original Amount: \$706

Original Creditor: MEDICAL-PA [REDACTED]
GROUP PC (Medical/Health Care)

Past Due: \$5812

Pay Status: In Collection

Remarks: ACCT INFO DISPUTED BY CONSUMR; PLACED FOR COLLECTION

Estimated month and year that this item will be removed: 08/2019

- End of Investigation results -

To view a free copy of your full, updated credit file, go to our website www.transunion.com/fullreport

-End of Credit Report-

001/001

Page 1 of 2

Prepared for: BETH DOOZ
Date: July 30, 2014
Report number: [REDACTED]



Dear BETH DOOZ ,

To assist you in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit report.

NATIONAL RECOVERY AGENCY

[REDACTED] PLEASE CONTACT CREDIT GRANTOR AT -800/734503-



Scan me with your smart phone
for special offers from Experian.



BETH DOOZ
352 TOMLINSON TER
PHILADELPHIA PA 19116-3216



PO Box 9701
Allen, TX 75013

Prepared for: BETH DOOZ

Date: July 30, 2014

Report number: [REDACTED]

Experian

A world of credit insights.

Dispute results**About our dispute process**

This summary shows the revision(s) made to your credit file as a result of our processing of your dispute. If you still question an item, then you may want to contact the furnisher of the information directly or review the original information in the public:

The federal Fair Credit Reporting Act provides that you may:

- request a description of how we processed your dispute, including the business name and address of any furnisher of information contacted in connection with such information and the telephone number if reasonably available;
- add a statement disputing the accuracy or completeness of the information; and
- request that we send these results to organizations who have requested your credit report in the past two years for employment purposes or six months for any other purpose.

If no information follows, our response appeared on the previous page.

How to read your results

Deleted - This item was removed from your credit report

Remains - This item was not changed as a result of our processing of your dispute

Updated - A change was made to this item; review this report to view the change. If ownership of the item was disputed, then it was verified as belonging to you

Processed - This item was either updated or deleted; review this report to learn its outcome

Results

We have completed the processing of your dispute(s). Here are the results:

Credit items	Outcome
NATIONAL RECOVERY AGEN [REDACTED]	Remains

Visit experian.com/status to check the status of your pending disputes at any time

Additional Information

To view a full copy of your corrected credit report, visit experian.com/viewreport

- ☐ To receive a copy by mail, check this box and within 30 days return this original page to P.O. Box 9701, Allen, TX 75013.

Copies will not be accepted.

What's your credit score?

Find out by ordering your VantageScore® from Experian for only \$7.95. To order, call 1 888 322 5583.

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

001

EQUIFAX

CREDIT FILE : January 31, 2014
Confirmation # 4029045498

P. O. Box 105518
 Atlanta, GA 30348

001577936-531
 Beth Potenick Dooz
 352 Tomlinson Ter
 Philadelphia, PA 19116-3216

Dear Beth Potenick Dooz:

Below are the results of your reinvestigation request and, as applicable, any revisions to your credit file. If you have additional questions regarding the reinvestigated items, please contact the source of that information directly. You may also contact Equifax regarding the specific information contained within this letter or report within the next 60 days by visiting us at www.investigate.equifax.com or by calling a Customer Representative at (888) 425-7961 from 9:00am to 5:00pm Monday-Friday in your time zone.

For an added convenience, use one of the below options to start an investigation or check the status of your dispute. Please note, when you provide documents, including a letter, to Equifax as part of your dispute, the documents may be submitted to one or more companies whose information are the subject of your dispute.

Visit us at www.equifax.com/CreditReportAssistance or Call us at 866-349-5186.

Thank you for giving Equifax the opportunity to serve you.

The Results Of Our Reinvestigation

Collection Agency Information (This section includes accounts that have been placed for collection with a collection agency.)

>>> We have researched the collection account. Account # [REDACTED] The results are: This creditor has verified to OUR company that the balance is being reported correctly. If you have additional questions about this item please contact: **National Recovery, 2491 Paxton St, Harrisburg PA 17111-1036 Phone: (800) 773-4503**

National Recovery: Collection Reported 01/2014; Assigned 08/2013; Creditor Class - Medical/Health Care; Client - PA [REDACTED] PC; Amount - \$706; Status as of 01/2014 - Unpaid; Date of 1st Delinquency 09/2012; Balance as of 01/2014 - \$812; Individual Account; Account # - 31938755; ADDITIONAL INFORMATION - Consumer Disputes This Account Information; Address: 2491 Paxton St Harrisburg PA 17111-1036 : (800) 773-4503

Notice to Consumers

You may request a description of the procedure used to determine the accuracy and completeness of the information, including the business name and address of the furnisher of information contacted, and if reasonably available the telephone number.

If the reinvestigation does not resolve your dispute, you have the right to add a statement to your credit file disputing the accuracy or completeness of the information; the statement should be brief and may be limited to not more than one hundred words (two hundred words for Maine residents) explaining the nature of your dispute.

If the reinvestigation results in the deletion of disputed information, or you submit a statement in accordance with the preceding paragraph, you have the right to request that we send your revised credit file to any company specifically designated by you that received your credit report in the past six months (twelve months for California, Colorado, Maryland, New Jersey and New York residents) for any purpose or in the past two years for employment purposes.

(Continued On Next Page)

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Date _____

EQUIFAX

CREDIT FILE : July 24, 2014
Confirmation # [REDACTED]

P. O. Box 105518
Atlanta, GA 30348

Beth Potenick Dooz
352 Tomlinson Ter
Philadelphia, PA 19116-3216

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The Results Of Our Reinvestigation

>>> **We have reviewed your concerns and our conclusions are:**

The disputed item pa heart vascular group /4301853 is currently not reporting on the Equifax credit file.

Collection Agency Information (This section includes accounts that have been placed for collection with a collection agency.)

>>> **We have researched the collection account. Account # - [REDACTED]** The results are: We verified that this item belongs to you. We have verified that this item has been reported correctly. If you have additional questions about this item please contact **National Recovery, 2491 Paxton St, Harrisburg PA 17111-1036 Phone: (800) 773-4503**

National Recovery; Collection Reported 07/2014; Assigned 09/2013; Creditor Class - Medical/Health Care; Client - PA [REDACTED] PC: Amount - \$706 ; Status as of 07/2014 - Unpaid; Date of 1st Delinquency 09/2012; Balance as of 07/2014 - \$812 ; Individual Account; Account # [REDACTED] ADDITIONAL INFORMATION - Consumer Disputes This Account Information; Address: 2491 Paxton St Harrisburg PA 17111-1036 ; (800) 773-4503

(Continued On Next Page)

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